

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BLAKE LIVELY,

Plaintiff,

-v-

WAYFARER STUDIOS LLC, et al.,

Defendants.

No. 24-cv-10049 (LJL) (lead case)

WAYFARER STUDIOS LLC, et al.,

Plaintiffs,

-v-

BLAKE LIVELY, et al.

Defendants.

No. 25-cv-00449 (LJL) (member case)

**DECLARATION OF ESRA A. HUDSON IN SUPPORT OF CONSOLIDATED
DEFENDANT BLAKE LIVELY’S MOTION FOR RULE 11 SANCTIONS AGAINST
PLAINTIFFS JENNIFER ABEL, MELISSA NATHAN, STEVE SAROWITZ, JAMEY
HEATH, IT ENDS WITH US MOVIE LLC, AND THEIR COUNSEL**

I, Esra A. Hudson, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney licensed to practice law in California and am a partner with the law firm of Manatt, Phelps & Phillips, LLP, counsel of record for Consolidated Defendant Blake Lively (“Ms. Lively”) in the above-captioned action. I have personal knowledge of the facts set forth herein, which are known by me to be true and correct, and if called as a witness, I could and would competently testify thereto.

2. I respectfully submit this declaration in support of Ms. Lively's Motion for Rule 11 Sanctions Against Plaintiffs Jennifer Abel, Melissa Nathan, Steve Sarowitz, Jamey Heath, It Ends With Us Movie LLC, and Their Counsel.

3. Attached as Exhibit A is a true and correct copy of the Safe Harbor Letter and motion that I served to Mr. Freedman, Mr. Schuster, and their respective law firms, regarding claims brought by Jennifer Abel, dated April 23, 2025.

4. Attached as Exhibit B is a true and correct copy of the Safe Harbor Letter and motion that I served to Mr. Freedman, Mr. Schuster, and their respective law firms, regarding claims brought by Melissa Nathan, dated April 23, 2025.

5. Attached as Exhibit C is a true and correct copy of the Safe Harbor Letter and motion that I served to Mr. Freedman, Mr. Schuster, and their respective law firms, regarding claims brought by Steve Sarowitz, dated April 23, 2025.

6. Attached as Exhibit D is a true and correct copy of the Safe Harbor Letter and motion that I served to Mr. Freedman, Mr. Schuster, and their respective law firms, regarding claims brought by Jamey Heath, dated April 23, 2025.

7. Attached as Exhibit E is a true and correct copy of the Safe Harbor Letter and motion that I served to Mr. Freedman, Mr. Schuster, and their respective law firms, regarding claims brought by It Ends With Us Movie LLC, dated April 23, 2025.

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8. Attached as Exhibit F is a true and correct copy of the Letter Response that Michael Gottlieb and I received from Ellyn S. Garofalo, dated May 13, 2025.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Los Angeles, California on this 19th day of May 2025.

/s/ Esra A. Hudson

Esra A. Hudson